

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

CUSTOMS AND TAX ADMINISTRATION
OF THE KINGDOM OF DENMARK
(SKATTEFORVALTNINGEN) TAX
REFUND SCHEME LITIGATION

This document relates to case nos.: 18-cv-07828; 19-cv-01785; 19-cv-01867; 19-cv-01893; 19-cv-01781; 19-cv-01783; 19-cv-01866; 19-cv-01895; 19-cv-01794; 19-cv-01865; 19-cv-01904; 19-cv-01798; 19-cv-01869; 19-cv-01922; 19-cv-01800; 19-cv-01788; 19-cv-01870; 18-cv-07827; 19-cv-01791; 19-cv-01792; 19-cv-01928; 19-cv-01926; 19-cv-01868; 18-cv-07824; 19-cv-01929; 19-cv-01803; 19-cv-01806; 19-cv-01906; 19-cv-01801; 19-cv-01894; 19-cv-01808; 19-cv-01810; 19-cv-01809; 18-cv-04833; 19-cv-01911; 19-cv-01898; 19-cv-01812; 19-cv-01896; 19-cv-01871; 19-cv-01813; 19-cv-01930; 18-cv-07829; 18-cv-04434; 19-cv-01815; 19-cv-01818; 19-cv-01931; 19-cv-01918; 19-cv-01873; 19-cv-01924; 19-cv-10713; 21-cv-05339

MASTER DOCKET

18-md-2865 (LAK)

DECLARATION OF MARC A. WEINSTEIN

I, Marc A. Weinstein, an attorney duly admitted to practice law before the courts of the State of New York, hereby declare as follows under penalty of perjury.

1. I am a partner at Hughes Hubbard & Reed LLP, counsel for Plaintiff Skatteforvaltningen (“SKAT”) in these actions. I am fully familiar with the matters set forth in this declaration.
2. I submit this declaration in support of SKAT’s Motion for Issuance of a Request for International Judicial Assistance to Obtain Evidence (Letter Rogatory).

3. Attached hereto as Exhibit 1 is a proposed Letter of Request for International Judicial Assistance Pursuant to the Hague Convention on the Taking of Evidence Abroad in Civil or Commercial Matters.

4. Attached hereto as Exhibit 2 is an unofficial translation of the March 1, 2024 criminal judgment against Anthony Mark Patterson issued by the Danish District Court in Glostrup, Denmark.

5. Attached hereto as Exhibit 3 is a copy of the Dubai International Financial Centre court's decision in (1) Levent (2) Lexie v. Lilika [2021] DIFC CFI 030.

6. Attached hereto as Exhibit 4 is a copy of the article *Exiled Trader Accused of Fraud Says Denmark Offered Four Years in a 'Nice Cell'*, dated October 7, 2020, available at <https://www.bloomberg.com/news/articles/2020-10-07/cum-ex-exile-shah-says-danes-offered-four-years-in-a-nice-cell>.

7. Attached hereto as Exhibit 5 is the transcript from the March 28, 2024 conference before the Court.

8. Attached hereto as Exhibit 6 is the Markowitz defendants' June 12, 2019 initial disclosures.

9. Attached hereto as Exhibit 7 is the van Merkensteijn defendants' June 12, 2019 initial disclosures.

10. Attached hereto as Exhibit 8 is an excerpt from the transcript of the April 9, 2021 deposition of defendant Richard Markowitz.

11. Attached hereto as Exhibit 9 is a document produced by Defendant John van Merkensteijn in discovery in these cases, bates-stamped JHVM_0004863.

I, MARC A. WEINSTEIN, hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
May 2, 2024

/s/ Marc A. Weinstein
Marc A. Weinstein